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July 2, 2004

Ms. Marlene H. Dortch
Secretary of the Commission
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARYATTN: Wireless Telecommunications Bureau

RE: *Cellular Phone of Kentucky, Inc.*
KNKN965
Kentucky 6-Madison (B1) RSA
Status Report: E-911 Phase II Compliance Efforts
CC Docket No. 94-102

Dear Ms. Dortch:

Pursuant to its *Supplement and Further Petition for Limited Waiver and Extension of Time* ("Petition"),¹ Cellular Phone of Kentucky, Inc., d/b/a Ramcell of Kentucky ("CPK") hereby submits its Phase II E-911 deployment Status Report. The *Petition* sought a further extension and limited waiver of the Commission's deadlines for CMRS carriers to begin selling and activating ALI handsets. This Status Report provides the Commission with the current state of CPK's efforts and progress towards meeting the extended ALI handset benchmarks.

In its *Petition*, CPK requested additional time to comply with the Section 20.18(g)(1) benchmarks,² because handset manufacturers did not carry ALI handsets compatible with CPK's TDMA network.³ Thus, CPK found it necessary to begin deployment of a CDMA overlay in its KY6 market. CPK indicated to the Commission that it would begin building-out its CDMA overlay in the fourth quarter of 2004 and that it expected to complete construction in 2006.⁴

¹ *Supplement and Further Petition of Cellular Phone of Kentucky, Inc., for a Limited Waiver and Extension of Time*, filed April 14, 2004.

² 47 C.F.R. 20.18(g)(1).

³ *Id.* at pages 3-4.

⁴ *Id.* at page 5.

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Ms. Marlene H. Dortch
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Page 2

CPK further anticipated that it would be able to begin selling an ALI handset on October 4, 2004.⁵

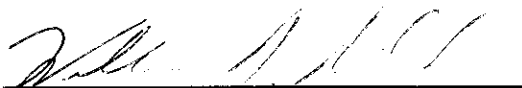
In support of its request for a further extension of the above-referenced deadlines to deploy ALI handsets, CPK volunteered to update the Commission on its CDMA deployment progress and also on its efforts to sell and activate an ALI handset. In this vein, CPK is pleased to report that, absent unforeseen circumstances, it will begin the construction of its CDMA network in its KY6 market in the fourth quarter of 2004. In addition, as specified in its *Petition*, CPK is on track to begin selling an ALI handset in its KY6 market by October 4, 2004. In preparation for this benchmark, CPK has made arrangements with a handset vendor to supply ALI handsets by October 2004. Should CPK not be able to meet either deadline due to unexpected delays, CPK will notify the Commission as soon as possible.

Please do not hesitate to contact the undersigned with any questions that you may have at (202) 783-4141.

Sincerely,

WILKINSON BARKER KNAUER, LLP

By:



William J. Sill
Counsel for Cellular Phone of Kentucky, Inc.

⁵ *Id.* at page 2.